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U.S. DISTRICT COURT  
SAN FRANCISCO, CALIF. 94105

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Attorneys for Defendant  
MITSUI O.S.K. LINES, LTD.

UNITED STATES DISTRICT COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION

GEORGINA HENSON

Plaintiff,

vs.

MITSUI O.S.K. LINES, LTD., and DOES 1  
through 20, inclusive

Defendants.

Case No.:

**AFFIDAVIT OF KATHARINE ESSICK  
SNAVELY IN SUPPORT OF NOTICE  
OF REMOVAL**

I, Katharine Essick Snavelly, declare as follows:


1. I am an attorney at law licensed to practice before all the courts of the State of California and before this Court, and am an associate in the law firm of Emard Danoff Port Tamulski & Paetzold LLP, attorneys for Mitsui O.S.K. Lines, Ltd., defendant to this action. I have personal knowledge of all the facts stated herein, and I could and would testify competently thereto if called upon as a witness to do so.

2. I have read plaintiff Georgina Henson's Longshoreman's Complaint for Damages for Personal Injuries (33 U.S.C. §§905(b), 933). Plaintiff's allegations indicate that the amount in controversy exceeds \$75,000.00. In the Complaint, Plaintiff alleges that she "did sustain

1 severe painful and disabling injuries to her right knee, left hip and head,” and that she “has been  
2 unable to engage in her normal and usual calling, and will suffer a diminution in future earning  
3 capacity.”

4 3. Based on the allegations in the Complaint, I am informed and believe that Plaintiff  
5 was, and still is, a citizen of the State of California. Defendant Mitsui was, at the time of the  
6 filing of this action, and still is, incorporated in the Japan, and has its principal place of business  
7 in Tokyo, Japan.

8 I declare under penalty of perjury under the laws of the State of California that he  
9 foregoing is true and correct and that this declaration was executed on May 8, 2008, at San  
10 Francisco, California.

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12 Katharine Essick Snavely  
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